

BROOKHAVEN NATIONAL LABORATORY Safety & Health Services Division INDUSTRIAL HYGIENE GROUP Standard Operating Procedure: Program Procedure	NUMBER IH50500
	REVISION SHSD FINAL Rev. 0
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Topic	FY01	FY02	FY03	FY04	FY05	FY06	FY07	FY08	FY09	FY10
Asbestos										
Bioaerosols										
Chemical & Biological Agents										
Chemical & Biological Pathogens										
Chemical & Biological Hazards										
Chemical & Biological Hazards										
Confined Spaces										
Engineering										
Environmental Health										
Food Safety										
HAZOP										
Lead										
Lead										
Noise and Hearing Conservation										
Non-ionizing Radiation										
PELs										
Respiratory Protection										
Sanitation										
Static Magnetic Fields										
Vibration - General Health										

1.0 Purpose & Scope

This document describes the strategic planning process of the SHSD Industrial Hygiene Group's *Self-Assessment* program. The purpose of the procedure is to establish an effective process to select self-assessments each year that collectively over several years ensure high quality IH programs are in place. The self-assessments are used to validate regulatory compliance and/or to target program improvements.

2.0 Responsibilities

- 2.1 This procedure is administered through the SHSD Industrial Hygiene Group. The IH Group Leader is responsible to:
 - 2.1.1 Create the long range schedule for assessments.
 - 2.1.2 Plan the program areas to be assessed each year.
 - 2.1.3 Assign IH staff to conduct assessments.
 - 2.1.4 Set assessment due dates, and
 - 2.1.5 Track progress and completion of assessments.

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3.0 Definitions

- 3.1 **Lead Assessor:** The person assigned to initiate, direct, document, and track a self-assessment to completion.

4.0 Prerequisites none

5.0 Precautions none

6.0 Procedure

- 6.1 **Equipment:** None
- 6.2 **Planning the assessment calendar:** In the first quarter of each year, the IH Group Leader identifies subject areas to receive self-assessment reviews that fiscal year. Ideally, all IH subject areas will be assessed on a (periodic) 3 years cycle. However, because of staffing limitations, the IH Group Leader is responsible to target high hazard subject areas and regulatory required assessment for the most frequent assessments and assign low hazard or limited-scope topics less frequent assessments. The IH Group Leader will assign a person to serve as the *Lead Assessor* for each topic to be reviewed.
- 6.3 **Special Emphasis Assessments:** In the first quarter of each year, the IH Group Leader, in conjunction with the IH Group Program Team Leader, will identify one or more subject areas that will receive an in-depth self-assessment of the program documentation and implementation by BNL organizations. These assessments may be “Collaborative” or “Observed” by the Brookhaven Area Office at their discretion.
- 6.4 **Regulatory Mandated Assessments:** In the first quarter of each year, the IH Group Leader will identify subject areas that have a regulatory mandate for a review of program documentation and/or implementation compliance. The subject areas will be the target for self-assessments that fiscal year. These assessments may be “Collaborative” or “Observed” by the Brookhaven Area Office at their discretion.

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Attachment 9.1 lists the regulatory and hazard basis for frequency of assessments for specific hazards, substances, or operations.

6.5 The IH Groups' self-assessments are documented by the following mechanisms:

- 6.5.1 Assessment for a five year span are selected by the IH Group Leader and documented the SHSD Self-Assessment Strategic Plan.
- 6.5.2 Each year at the beginning of the fiscal year, the IH Group Leader updates the long range strategic plan for assessments. See **Attachment 9.3 IH Group Self-assessment Strategic Plan** for an acceptable format of the strategic plan. The Strategic Plan will be updated throughout the year as changes in strategy occur.
- 6.5.3 Each year at the beginning of the fiscal year, the IH Group Leader sends to the SHSD Manager a list and schedule of subject areas that are to receive self-assessment reviews that fiscal year. See **Attachment 9.2 IH Group Self-assessment Fiscal Year Plan** for a sample of an acceptable submittal format.
- 6.5.4 Each week during an assessment's active period, the *Lead Assessor* provides the IH group Leader with a status report on:
 - Activity for the week,
 - Progress towards milestones and the project completion date, and
 - Any obstacles that might prevent closure by the due date.
 - An example of an acceptable weekly report is **Attachment 9.4: Weekly Status Report**.
- 6.5.5 Each week during periods of assessment activity, the IH Group Leader provides the SHSD Manager with a status report on all IH Group Self-Assessments. The status report will contain information on active assessments and status of work towards closure of corrective actions from all previous IH Self-assessments. An example of an acceptable weekly report is **Attachment 9.4: Weekly Status Report**.

7.0 Implementation and Training

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- 7.1 **Qualification Criteria:** The IH Group Leader will instruct all *Lead Assessors* in their role relative to this procedure. No formal record of training will be maintained. Performance will be measured by weekly review of assessment status reports.

8.0 References

- 8.1 Industrial Hygiene Auditing: A Manual for Practice, A. Leibowitz, AIHA Publications, 1994.

9.0 Attachments

- 9.1 **Attachment 9.1: *Regulatory And Hazard Basis For Frequency Of Assessments***
- 9.2 **Attachment 9.2: *BNL IHG Self-assessment Fiscal Year Plan***
- 9.3 **Attachment 9.3: *BNL IHG Self-assessment Strategic Plan***
- 9.4 **Attachment 9.4: *Sample of Weekly Status Report.***

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10.0 Documentation

Document Review Tracking Sheet		
PREPARED BY: <i>(signature and date on file)</i> R. Selvey Author Date 10/28/03	REVIEWED BY: <i>(signature and date on file)</i> J. Peters Date 10/30/03	APPROVED BY: <i>(signature and date on file)</i> R. Selvey Group Leader Date 10/31/03
Filing Code: IH52QR.03	DQAR Date	Effective Date: 10/31/03

Periodic Review Record		
Date of Review	Reviewer Signature and Date	Comments Attached

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Attachment 9.1

Regulatory and Hazard Basis For Frequency of Self-Assessments

Subject areas with mandated annual reviews are:

- Chemical Hygiene Plan [29CFR191.1450(e)(4)]
- Confined Space Cancelled Permit Review [29CFR191.146(d)(14)]
- Bloodborne Pathogen Exposure Control Plan [29CFR1910.1030(c)(1)(v) and (c)(1)(iv)(B)]

Subject areas with regulatory requirements for periodic reviews (unspecified frequency), that IH Group has targeted for annual frequency, are:

- Respiratory Protection Program [29CFR1910.134 (c)(1)(ix); (c)(3); and (l)(1), and ANSI Z88.2 (5.3)]
- Lasers [ANSI Z136.1 (1.3.2.8)]

Subject areas with regulatory requirements calling for reviews when there is reason to believe the program needs updating are:

- Asbestos- General Industry [29CFR1910.1001 (f)(2)]
- Beryllium- CBDPP BNL's equivalent [10CFR850.10(2)(c.) and 10CFR850.40(a)]

Subject areas with regulatory requirements calling for reviews of written exposure control plans triggered by over exposure to OSHA PELs are the following OSHA Regulated Chemicals:

- Acrylonitrile 29CFR1910.1045 6 month revision cycle
- Arsenic 29CFR1910.1018 6 month revision cycle
- Benzene 29CFR1910.1028 revision cycle based on monitoring data
- Butadiene, 1,3- 29CFR1910.1051 12 month revision cycle
- Cadmium 29CFR1910.1027 12 month revision cycle
- Ethylene Oxide 29CFR1910.1047 12 month revision cycle
- Lead 29CFR1910.1025 and 29CFR1926.62 6 month revision cycle
- Vinyl Chloride 29CFR1910.1017 6 month revision cycle

Subject areas without regulatory requirements calling for program reviews, but that the IH Group targets for periodic assessments are:

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- Biohazard/Etiologic Agents [DOE N450.7]
- Exhaust Ventilation: HEPA Surveillance testing [ANSI N510; N509]
- Local Exhaust Control Ventilation: [29CFR1910.94]
- Hazard Communication Program [29CFR1910.1200]
- Noise and Hearing Conservation Program [29CFR1910.95]
- Non-ionizing radiation [29CFR1910.95]

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Attachment 9.2

Self-Assessment Fiscal Year Plan

Sample

	Title (Bold means active for IHG)	Milestone Item	Owner	ATS Due Date
Special Emphasis Assessment (Major)				
1.	Topic 1	Final Report	<i>Lead Assessor' Name</i>	MM/DD/YY
2.	Topic 2	Final Report	<i>Lead Assessor' Name</i>	MM/DD/YY
3.	Topic 3	Final Report	<i>Lead Assessor' Name</i>	MM/DD/YY
Mandated Annual				
4.	Bloodborne Pathogen Exposure Control Plan Review	Final Report	<i>Lead Assessor' Name</i>	MM/DD/YY
5.	Confined Space Permit Review	Final Report	<i>Lead Assessor' Name</i>	MM/DD/YY
6.	Chemical Hygiene			MM/DD/YY
BNL Periodic				
7.	Beryllium Use			MM/DD/YY
8.	Noise & Hearing			MM/DD/YY
9.	HEPA Filter & Ventilation			MM/DD/YY
10.	Laser	Final Report	<i>Lead Assessor' Name</i>	MM/DD/YY
11.	Respiratory Protection	Final Report	<i>Lead Assessor' Name</i>	MM/DD/YY
12.	Asbestos	Final Report	<i>Lead Assessor' Name</i>	MM/DD/YY
13.	Biohazard- Etiological Agent Use Review	Final Report	<i>Lead Assessor' Name</i>	MM/DD/YY
14.	HazCom & OSHA Regulated Chemicals	Final Report	<i>Lead Assessor' Name</i>	MM/DD/YY
15.	Non-ionizing Radiation	Final Report	<i>Lead Assessor' Name</i>	MM/DD/YY

The only official copy is on-line at the SHSD IH Group website.
Before using a printed copy, verify that it is current by checking the document issue date on the website.

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Attachment 9.3
IH Group Self-Assessment Strategic Plan

(SEE NEXT PAGE)

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Attachment 9.2 Sample: IH Group Self-Assessment Strategic Plan

Effective/Revision Date: mm/dd/yy

	Title	FY99	FY00	FY01	FY02	FY03	FY04	FY05	FY06	FY07	FY08	FY09
1.	Asbestos			SBMS			BSA Q2					
2.	Beryllium	Tech Doc	SBMS			BSA Q2	BSA Q3					
3.	Biohazards/Etiologic Agents		DOE IG		BSA;SBMS							
4.	Bloodborne Pathogens					SBMS- Q4						
5.	Chemicals- HazCom/ORC	BAO	BAO Lead	BSA- CPE	BSA ORC	SBMS-Q3	BSA Q4					
6.	Chemicals- CHP	BAO			SBMS	SBMS-Q3	BSA Q4					
7.	Confined Spaces	BAO	BSA		BSA-SBMS	BSA Q4	BSA Q4					
8.	Ergonomics											
9.	HazWoper (IH response)											
10.	Heat Stress											
11.	IAQ											
12.	Lasers	BAO	SBMS									
13.	Lead		BAO									
14.	Noise and Hearing Conservation			BAO BSA	BSA	BSA Q4; (SBMS 2 nd)	BSA Q4					
15.	Non-Ionizing Radiation		BAO &BSA	BSA								
16.	PPE			BSA	SBMS							
17.	Respiratory Protection		BSA/BAO	BSA;SBMS	BSA	BSA Q4	BSA Q4					
18.	Sanitation											
19.	Static Magnetic Fields			SBMS								
20.	Ventilation- Exhaust/ HEPA	BSA/BAO	BSA		BSA	SBMS Q3 (Summer Project)	BSA Q4					

Orange = BNL Annual Green = Assessment Completed Blue = Assessment Scheduled Violet = Assessment Needed Pink = Use Form Review Only Yellow = Program Development in lieu of Assessment

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Attachment 9.3

Sample of Weekly Status Report

SHSD IH Group Self-assessments FYyy
Status for week of: mm/dd/yy- mm/dd/yy

	Title (Bold means active for IHG)	WBS Item	Action this week by IHG	ATS Due Date/ IHG Owner
1.	Assessment 1 FYnn w/BAO	Scoping meeting		Open/ OWNER
		Announcement to Organizations		Closed/OWNER
		Program & Field Review		Closed/ OWNER
		Team Draft		Closed/ OWNER
		Factual Accuracy Report		Closed/ OWNER
		Final Report		OWNER
2.	Assessment 2 FYnn BAO Annual	Corrective Action Plan		OWNER
		Closure of SHSD Action Items		OWNER
		Announcement to Organizations		OWNER
		Program & Field Review		OWNER
		Team Draft		OWNER
		Factual Accuracy Report		OWNER
		Final Report		OWNER
		Corrective Action Plan		OWNER
		Closure of SHSD Action Items		OWNER
		Announcement to Organizations		Closed
		Program & Field Review		Open/ OWNER
		Team Draft		Open/ OWNER
		Factual Accuracy Report		Open/ OWNER
		Final Report		Open/ OWNER
		and Corrective Action Plan		Open/ OWNER
		Closure of SHSD Action Items		Open/ OWNER

Color Code: Green = closed; white = on-track; red = over due